

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CENTURY INDEMNITY COMPANY, as
successor to Insurance Company of North
America; ACE PROPERTY & CASUALTY
INSURANCE COMPANY (f/k/a CIGNA
Property & Casualty Insurance Company), as
successor-in-interest to Central National
Insurance Company of Omaha, but only as
respects policies issued by it through
Cravens, Dargan & Company, Pacific Coast;
and PACIFIC EMPLOYERS INSURANCE
COMPANY,

Plaintiffs,

v.

TRANSATLANTIC REINSURANCE
COMPANY,

Defendant.

Civil Action No. 07-CV-10712 (VM) (ECF)

**NOTICE OF MOTION TO ADMIT
PAUL ALP *PRO HAC VICE***

FILED
U.S. DISTRICT COURT
2008 APR 23 PM 2:55
SOUTHERN DISTRICT OF NEW YORK

PLEASE TAKE NOTICE that upon the annexed affidavit of Paul Alp, sworn to on April 22, 2008, the Certificate of Good Standing annexed thereto, and the annexed affidavit of Frank M. Esposito, sworn to on April 23, 2008, we will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order admitting Paul Alp *pro hac vice* to argue or try this case in whole or in part as counsel for plaintiffs Century Indemnity Company, as successor to Insurance Company of North America; ACE Property & Casualty Insurance Company (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and Pacific Employers Insurance Company. There are no disciplinary proceedings pending against Paul Alp in any State or Federal Court.

In accordance with Rule 2(B) of the Court's Individual Practice Rules, counsel to the parties have conferred with respect to the relief requested herein, and counsel to defendant consents to the admission *pro hac vice* of Paul Alp.

Dated: April 23, 2008

CROWELL & MORING LLP

By: 

Frank M. Esposito (FE2558)

153 East 53rd St., 31st Floor

New York, NY 10022

(212) 223-4000

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
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Defendant

State of New York)

)

ss:

County of New York)

Civil Action No. 07-CV-10712 (VM) (ECF)

**AFFIDAVIT OF FRANK M. ESPOSITO IN
SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

FRANK M. ESPOSITO, being duly sworn, hereby deposes and says as follows:

1. I am a counsel with the firm Crowell & Moring LLP, attorneys for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Paul Alp as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in March, 1998. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Paul Alp since November 2007.

4. Paul Alp is a counsel with Crowell & Moring, in Washington D.C.

5. I have found Mr. Alp to be a skilled attorney and a person of integrity. He is experienced in Federal Practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Paul Alp, *pro hac vice*.

7. I respectfully submit a proposed order granting admission of Paul Alp, *pro hac vice*, which is attached hereto as Exhibit A.

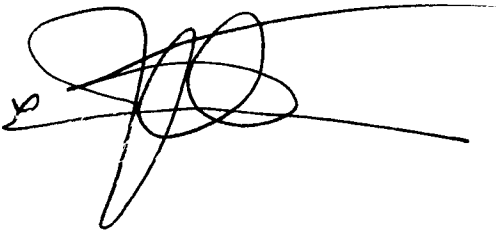
WHEREFORE it is respectfully requested that the motion to admit Paul Alp, *pro hac vice*, to represent Plaintiffs in the above matter, be granted.

April 23, 2008
New York, New York



FRANK M. ESPOSITO

JOHN J. LUND
Notary Public, State of New York
No. 01LU6163687
Qualified in New York County
Commission Expires April 2, 2011



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**ADMISSION TO PRACTICE
PRO HAC VICE**

The motion for the admission of Paul Alp to practice *pro hac vice* in the above captioned matter is granted. The admitted attorney, Paul Alp, is permitted to argue or try this particular matter in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms the appearance of Paul Alp as counsel to defendant in this case, and it will be entered on the Court's docket. A notation of his admission *pro hac vice* for the above listed case will be made on the roll of attorneys. In addition, he must register with Electronic Case Filing in this case.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Dated:

United States District Judge

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**AFFIDAVIT OF PAUL ALP IN
SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

City Of Washington)
) ss.:
District Of Columbia)

Paul Alp, being duly sworn, hereby deposes and says as follows:

1. I am an attorney with the law firm of Crowell & Moring LLP.
2. I submit this affidavit in support of my motion for admission to practice
pro hac vice in the above captioned matter.
3. I am a member in good standing of the District of Columbia Bar
(Certificate of Good Standing attached hereto), the Maryland State Bar,
and the Indiana State Bar.

4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this one case.

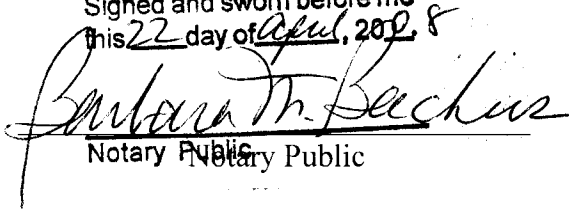


Paul Alp
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004
palp@crowell.com
(202) 624-2500

Dated: April 22, 2008

DISTRICT OF COLUMBIA:

Signed and sworn before me
this 22 day of April, 2008.


Notary Public

Barbara M. Backus
Notary Public, District of Columbia
My Commission Expires 7/14/2012



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710


I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PAUL ALP

was on the 7TH day of DECEMBER, 1998
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on April
21, 2008.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

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CERTIFICATE OF SERVICE

I certify that on April 23, 2008, I caused true and correct copies of (a) the Notice of Motion to Admit Paul Alp *Pro Hac Vice*, (b) the Affidavit of Paul Alp, sworn to on April 22, 2008, and the Certificate of Good Standing annexed thereto, (c) the Affidavit of Frank M. Esposito, sworn to on April 23, 2008; and (d) a proposed Order granting Paul Alp admission *pro hac vice*, to be served upon (1) Mark A. Kreger, Esq., attorney for defendant, Locke Lord Bissell & Liddell, LLP, 111 South Wacker Drive, Chicago, Illinois 60606, by first class mail by

depositing same, enclosed in properly addressed and postage paid envelopes, in an official depository under the exclusive custody and control of the United States Postal Service located in New York, New York.

Dated: April 23, 2008

By: 
Frank M. Esposito (FE2558)
CROWELL & MORING LLP
Attorneys for Plaintiffs
153 East 53rd St., 31st Floor
New York, NY 10022
(212) 223-4000
fesposito@crowell.com